

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TALECRIS BIOTHERAPEUTICS, INC. and)	
BAYER HEALTHCARE LLC,)	
)	
Plaintiffs,)	
)	C. A. No. 05-349-GMS
v.)	
)	JURY TRIAL DEMANDED
BAXTER INTERNATIONAL INC. and)	
BAXTER HEALTHCARE CORPORATION,)	
)	
Defendants.)	PUBLIC VERSION
)	
)	
<hr/>		
BAXTER HEALTHCARE CORPORATION,)	
)	
Counterclaimant,)	
)	
v.)	
)	
TALECRIS BIOTHERAPEUTICS, INC. and)	
BAYER HEALTHCARE LLC,)	
)	
Counterdefendants.)	

**SUPPLEMENTAL DECLARATION OF ANNE M. ROGASKI IN SUPPORT OF
SUMMARY JUDGMENT MOTION FILED BY BAXTER INTERNATIONAL INC.
AND BAXTER HEALTHCARE CORPORATION**

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Baxter Healthcare Corporation*

Dated: April 12, 2007
Public Version: April 17, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC. and
BAYER HEALTHCARE LLC,

Plaintiffs,

v.

BAXTER INTERNATIONAL INC. and
BAXTER HEALTHCARE CORPORATION,

Defendants.

BAXTER HEALTHCARE CORPORATION,

Counterclaimant,

v.

TALECRIS BIOTHERAPEUTICS, INC. and
BAYER HEALTHCARE LLC,

Counterdefendants.

Civil Action No.: 05-349-GMS

Jury Trial Demanded

PUBLIC VERSION

**SUPPLEMENTAL DECLARATION OF ANNE M. ROGASKI IN SUPPORT OF
SUMMARY JUDGMENT MOTION FILED BY BAXTER INTERNATIONAL
INC. AND BAXTER HEALTHCARE CORPORATION**

I, Anne M. Rogaski, declare:

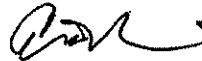
1. I am a partner at the law firm of Townsend and Townsend and Crew LLP and one of the counsel of record for Defendant Baxter International Inc. and Defendant/Counterclaimant Baxter Healthcare Corporation (collectively "Baxter"). I make this declaration of my personal knowledge.

2. True and correct copies of pages 127-130 of the highly confidential deposition transcript from the August 16, 2006 deposition of Joan D. Robertson are

attached hereto as Exhibit 19.

3. A true and correct copy of the Summary of Manufacturing and Testing History for Immune Globulin Intravenous (Human), 10% Solvent/Detergent Treated (IGIV-SD) Lot Numbers 26N1RH1, 26N1NJ1, 26N2521, 26N16X1, 26N1721, 26N1RJ1 (TAL013919 - TAL013923) is attached hereto as Exhibit 20.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 12th day of April, 2007 at Palo Alto, California.



Anne M. Rogaski

Public Version: April 17, 2007

EXHIBIT 19

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT 20

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on April 17, 2007, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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I hereby certify that on April 17, 2007 I have sent by E-mail and Federal Express the foregoing document to the following non-registered participants:

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